

## **EXHIBIT C**

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	
EX REL. DAWN BARRETT,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil Action No. 03-12382-MLW
	)	
CIGNA CORPORATION and	)	
LIFE INSURANCE COMPANY OF	)	
NORTH AMERICA,	)	
	)	
Defendants.	)	
_____	)	

**DECLARATION OF DAWN BARRETT**

I, Dawn Barrett, declare based on my personal knowledge as follows:

1. I am the named plaintiff in the above-captioned suit.
2. I am an employee of Life Insurance Company of North America (LINA). In this capacity I currently work as a Disability Claims Manager in Pittsburgh, Pennsylvania.
3. When I perform the duties of my job, I represent to insureds and others with whom I do business that I am a representative of CIGNA. My business card lists me as a CIGNA representative and training materials I have received have been titled CIGNA. When I answer the phone, I have been trained to say "Thank you for calling CIGNA."
4. All of the other LINA employees with whom I work similarly represent themselves to the public, and to insureds, as representatives of CIGNA.
5. I am personally aware that there are insureds in Massachusetts for whom I am currently managing their disability claim. For example, attached to this Declaration is a letter that I recently sent to an insured in North Andover, Massachusetts. The letter is on CIGNA

letterhead and uses CIGNA insignia.


6. Disability claimants who are insured through policies written by LINA and are living in Massachusetts are subject to CIGNA's uniform policy of causing all LTD claimants to submit claims for SSDI without regard to their eligibility for SSDI.

7. Based on my training and experience with CIGNA and LINA, it is my understanding that LINA employees are representing CIGNA in any state where an insurance policy is written from one of the CIGNA companies.

I hereby declare that the foregoing is true to the best of my knowledge and based on my reasonable investigation and belief.

Date:

July 13, 2006

  
Dawn Barrett